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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

IN RE: THE CHURCH OF JESUS CHRIST
OF LATTER-DAY SAINTS TITHING
LITIGATION

This document relates to all actions.

**JOINT STIPULATED MOTION TO
EXTEND TIME TO FILE
PROPOSED ESI PROTOCOLS
AND PROTECTIVE ORDERS**

Case No. 2:24-md-03102-RJS-DAO

Chief Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

The Church of Jesus Christ of Latter-day Saints and Ensign Peak Advisors, Inc. (collectively “Defendants”), along with Plaintiffs Daniel Chappell, Masen Christensen, John Oaks, Mark Wilson, Joel Long, Brandall Brawner, Kevin Risdon, Gene Judson, and Michelle Judson (collectively “Plaintiffs,” and together with Defendants, the “Parties”), hereby jointly submit this stipulated motion to extend the time to file a proposed ESI protocol and protective order.

The Court’s December 5, 2024 Order directs the Parties to file no later than January 10, 2025 a stipulated proposed ESI protocol and protective order, or if they cannot agree, separate proposed ESI protocols and protective orders. *See Order (MDL Dkt. 123) at 1.* The Parties request an additional extension of that deadline, with a new deadline of February 7, 2025. Good cause

exists for the extension, including that the Parties have continued to engage in productive negotiations regarding each, exchanged drafts and comments, and conducted multiple conferences regarding the same. The Parties believe, however, that the additional time may allow them to resolve certain areas of disagreement without the need to bring the matters before the Court. Given that discovery is currently stayed, *see* Order (MDL Dkt. 105), an additional extension of the deadline will not have an impact on the case.

Date: January 8, 2025

Respectfully submitted,

/s/ Jason R. Burt

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Date: January 8, 2025

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CERTIFICATE OF SERVICE

On this 8th day of January, 2025, I hereby certify that I electronically filed the foregoing JOINT STIPULATED MOTION TO EXTEND TIME TO FILE PROPOSED ESI PROTOCOLS AND PROTECTIVE ORDERS with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all the parties.

/s/ Jason R. Burt